

ALAN W. WESTBROOK, ESQ.
Nevada Bar No. 006167
PERRY & WESTBROOK,
A Professional Corporation
11500 S. Eastern, Suite 140
Henderson, NV 89052
Telephone: (702) 870-2400
Facsimile: (702) 870-8220
Email: awestbrook@perrywestbrook.com
Attorneys for Defendants,
Gary Yaggie and Smartway Trucking, Inc.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

KAYLA KATHERIN VARGAS, an
individual,

Plaintiff,

vs.

GARY YAGGIE, an individual;
SMARTWAY TRUCKING, INC., a
Domestic Corporation; DOES I through XV,
and ROE Corporations I through X, inclusive,

Defendants.

Case No.: 2:24-cv-01372-MDC

STIPULATION AND ORDER TO
EXTEND DEADLINE FOR
DEFENDANTS, GARY YAGGIE AND
SMARTWAY TRUCKING, INC., TO
RESPOND TO PLAINTIFF'S OFFER OF
JUDGMENT

The Parties to this action, by and through their respective counsel of record, hereby stipulate to and request an Order in this matter extending the time for Defendants, Gary Yaggie and Smartway Trucking, Inc., to respond to Plaintiff's Offer of Judgment that was served via First Class, U.S. Mail, postage prepaid on September 20, 2024.

The parties have discussed the need to obtain additional information for Defendants to reasonably evaluate the Offer of Judgment and have agreed to extend the fourteen-day time period

1 to respond to an Offer of Judgment, as set forth in F.R.C.P. 68 and associated case law, by an
2 additional thirty days, to, and including, November 4, 2024. During this additional time, the
3 parties have agreed that an F.R.C.P. 35 Examination will be conducted by the defense-retained
4 physician, Dr. Vladimir Sinkov, on October 16, 2024, and the deposition of Plaintiff will be
5 conducted on a date currently being determined, but in any case, prior to November 4, 2024.
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8 **IT IS SO STIPULATED:**

9 DATED this 2nd day of October, 2024

DATED this 2nd day of October, 2024

10 /s/ Mahna Pourshaban
11 Mahna Pourshaban, Esq.
12 Nevada Bar No. 13743
13 GINA CORENA & ASSOCIATES
14 300 S. Fourth Street, Suite 1400
Las Vegas, Nevada 89101
Attorneys for Plaintiff

/s/ Alan W. Westbrook
Alan W. Westbrook, Esq.
Nevada Bar No. 006167
PERRY & WESTBROOK
11500 S. Eastern Avenue, Ste. 140
Henderson, Nevada 89052
Attorneys for Defendants,
Gary Yaggie and Smartway Trucking, Inc.

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16 **IT IS SO ORDERED.**

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19 **JUDGE OF THE DISTRICT COURT**

20 **DATED:** 10-4-24
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